IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

DARLENE GIBBS, STEPHANIE EDWARDS, LULA WILLIAMS, PATRICK INSCHO, and LAWRENCE MWETHUKU, on behalf of themselves and all individuals similarly situated,

Civil Action No. 3:17-cv-495-MHL

Plaintiffs,

V.

PLAIN GREEN, LLC, and GREAT PLAINS LENDING, LLC,

Defendants.

PLAIN GREEN, LLC'S MOTION TO DISMISS THE COMPLAINT WITHOUT LEAVE TO AMEND OR, IN THE ALTERNATIVE, TO COMPEL ARBITRATION

For the reasons set forth in the accompanying memorandum of law, Defendant Plain Green, LLC, by its undersigned attorneys, moves to dismiss Plaintiffs' Complaint without leave to amend, or, in the alternative, to compel arbitration. A proposed order is attached hereto.

Dated: September 19, 2017 /s/ Richard J. Zack

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ATTORNEYS FOR DEFENDANT PLAIN GREEN, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of September, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all parties of record.

By: /s/Matthew Foster
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